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March 15, 2024

Via ECF

The Honorable William F. Kuntz, II
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *United States v. Motovich et al.*, 21-CR-497 (WFK)

Dear Judge Kuntz:

We represent defendant David Motovich in the above-referenced matter. We write to respectfully request temporary modifications of Mr. Motovich's conditions of pretrial release to permit him to attend family life-events and religious programming. These events have been approved in the past year under Mr. Motovich's bail conditions, and are made again with the consent of the Pretrial Services Office ("PTS") and the government. Specifically, we respectfully request authorization for Mr. Motovich to attend the following:

1. Attend a dinner with his wife and children to celebrate his wife's birthday at a local restaurant in Manhattan on March 17, 2024;
2. Observe the Purim religious holiday and attend services with his immediate family and members of his synagogue at a location near the family home on March 23, 2024; and
3. Visit the addresses of different Rabbis and family friends, all located in New York City, to deliver Purim baskets as per religious custom in observance of the holiday of Purim on March 24, 2024.

As stated above, we have conferred with Pretrial Services and counsel for the government, both of whom have no objection to these requests. We have also provided specific details of the events to Pretrial Services directly.

Respectfully submitted,

/s/ HEM
Henry E. Mazurek
Counsel for Defendant David Motovich